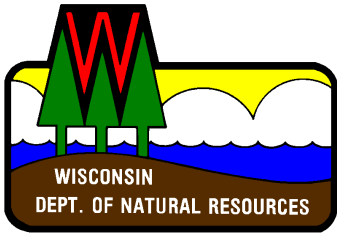


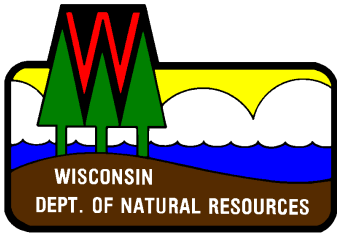
Controlling Mercury Emissions

Viewpoint of Wisconsin DNR
presented to Mercury CAC
by Lloyd Eagan - January 9, 2002



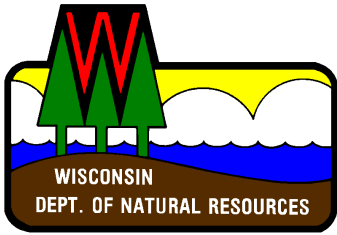
Why Propose NR 446?

- ◆ Very important issue from an environmental standpoint
- ◆ Human health effects well documented historically and currently
- ◆ CDC data shows 10% of U.S. women have blood levels that would harm unborn
- ◆ Ecological data also shows persistent environmental impacts.



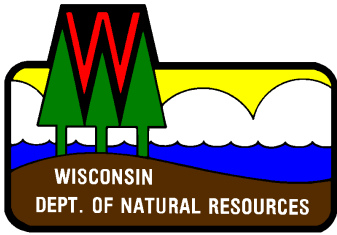
Why Propose NR 446

- ◆ We believe prompt action is vital!
- ◆ Economic interests are impacted too.
- ◆ Wisconsin has as much at stake in this issue as anybody.
- ◆ We can influence national efforts.
- ◆ Wisconsin did something similar with S02 and Acid Rain which worked well.



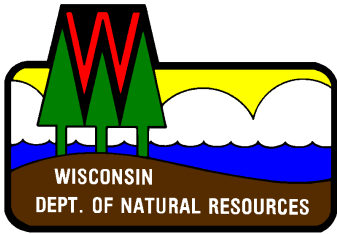
History of NR 446

- ◆ Mercury reduction efforts have been considered for 11 years.
- ◆ We have known for some time that emissions of mercury are a significant contributing factor to the presence of mercury in aquatic life and human beings.



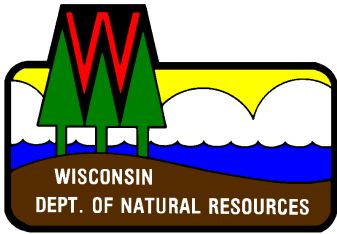
History Continued:

- ◆ DNR has had a long term mercury advisory process:
 - ◆ The Mercury Stakeholders Group met in 1999
 - ◆ State Legislation considered in 2000-2001
 - ◆ NRB acted upon citizen petition in 2000
 - ◆ Current citizen review and recommendations in process



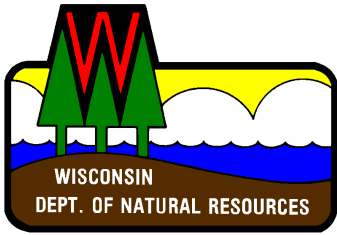
Why Propose NR 446?

- ◆ Federal approach to mercury is limited - may only cover 1/2 of WI emissions
- ◆ Federal MACT cannot consider trading and other flexible approaches to emissions reductions
- ◆ Federal interest in multi-pollutant legislation is strong and would greatly impact utilities
- ◆ Ensure early reductions are credited



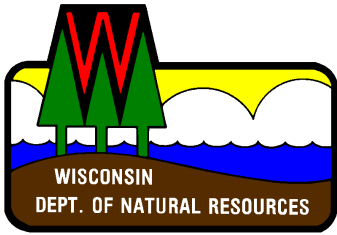
Why Propose NR 446?

- ◆ Need to reduce emissions comprehensively.
- ◆ Reasonable phased mercury emissions reductions from an established baseline
- ◆ Include flexibility with banking and trading
- ◆ Respond to electric reliability concerns
- ◆ Periodically re-evaluate and adjust rule if needed for industry or environmental issues



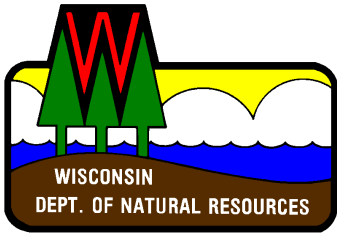
Where Do We Go From Here?

- ◆ Need for constructive input to make our mercury reduction effort effective and feasible.
- ◆ Must make credible mercury emissions reduction progress
- ◆ Must be economically viable
- ◆ March 2002 - target to deliver recommendations to Secretary Bazzell



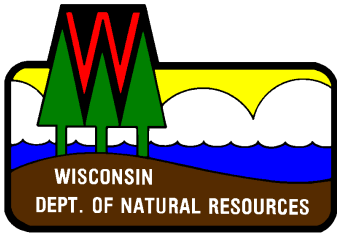
Where Do We Go From Here?

- ◆ Consider the Precautionary Principle.
- ◆ When we have some information about harm, even though the science is uncertain we should act.
- ◆ DNR will act but would like recommendations to make a better rule.



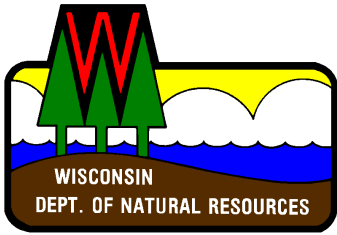
Where Do We Go From Here?

- ◆ Agree on approach to “Value Issues”
 - ◆ Share viewpoints
 - ◆ Document areas of difference
 - ◆ Provide measurement of intensity of difference
- ◆ Agree on approach to “Technical Issues”
 - ◆ What is known and what TAG will do
 - ◆ What is unknown
 - ◆ Recommendations from CAC



Opportunities

- ◆ Opportunity: Provide a “cutting edge” model for the country and drive meaningful regulations
- ◆ Opportunity - Your input will affect the WAY in which DNR prepares regulation.



Constraints

- ◆ Time: Dragging out the CAC process out will compromise the opportunities
- ◆ The DNR Secretary will advance Mercury Emission Reduction Rules with or without CAC input
- ◆ The scientific understanding of Mercury emissions and their public health and environmental impacts isn't perfect